

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TAJI HASAN,

Plaintiff,

DECLARATION OF SERVICE
07 CV 11467 (VM)(RLE)

- against -

THE CITY OF NEW YORK, ET AL.,

Defendants.

STATE OF NEW YORK)

: SS. :

COUNTY OF KINGS)

MATTHEW FLAMM, declares the following under penalty of perjury pursuant to 28 U.S.C. §1746:

That on December 21, 2007, I served the COMPLAINT upon defendant CITY OF NEW YORK by personally delivering a copy to 100 Church Street, New York, New York, that being the address within the State designated for that purpose, as evidenced by the date/time stamp appearing on the first page of the Complaint.


Matthew Flamm

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDGE MARRERO

07 CV 11467

TAJI HASAN,

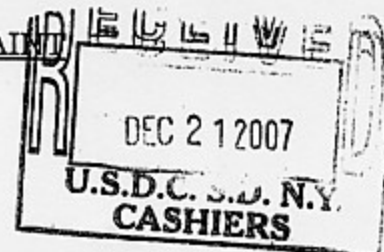
Plaintiff,

- against -

THE CITY OF NEW YORK, ARMANDO
ERAZO and "JOHN" CALHOUN, the first
name being fictitious and presently
unknown, employees of the New York City
Police Department,

Defendants.

COMPLAINT



Jury Trial Demanded

Taji Hasan, by his attorney, Matthew Flamm, alleges the following upon
information and belief as his Complaint:

Nature of the Action

1. This civil rights action arises from the July 31, 2007 unlawful
assault on and arrest of Taji Hasan. Plaintiff seeks declaratory relief pursuant to
28 U.S.C. §2201 as well as compensatory and punitive damages for violation of his
civil rights under 42 U.S.C. §1983.

Jurisdiction and Venue

2. This action arises under the United States Constitution and 42
U.S.C. §1983. This Court has subject matter jurisdiction pursuant to 28 U.S.C.
§1331 and §1343(3). Plaintiff asserts jurisdiction over the City of New York under
28 U.S.C. §1367. Plaintiff requests that this Court exercise pendent jurisdiction
over those state law claims arising out of the same common nucleus of operative
facts as do plaintiff's federal claims.

3. Under 28 U.S.C. §1391(b) and (c), venue is proper in the Southern
District of New York because defendant City of New York resides in that judicial
District.